

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN -- SOUTHERN DIVISION

KECIA BAKER,
Plaintiff,

-vs.-

DEMAND FOR JURY TRIAL

NORTHSTAR LOCATION SERVICES, LLC.,
a foreign corporation,
Defendant.

COMPLAINT & JURY DEMAND

Plaintiff, Kecia Baker, through counsel, Nitzkin and Associates, by Gary Nitzkin states
the following claims for relief:

JURISDICTION

1. This court has jurisdiction under the FDCPA, 15 U.S.C. §1692k(d) and 28 U.S.C.
2. §§1331,1337.
3. This court may exercise supplemental jurisdiction over the related state law claims
arising out of the same nucleus of operative facts which give rise to the Federal law
claims.

PARTIES

4. The Defendant to this lawsuit is Northstar Location Services, LLC ("Northstar") which is
a corporation doing business in New York.

VENUE

5. The transactions and occurrences which give rise to this action occurred in Macomb County, Michigan.
6. Venue is proper in the Eastern District of Michigan.

GENERAL ALLEGATIONS

7. Beginning in early September of 2010, Plaintiff began receiving telephone calls from the Defendant at her place of employment.
8. Plaintiff immediately ordered and directed the Defendant to cease all further communication with her at employment.
9. Despite the Plaintiff's directive, the Defendant continued to call the Plaintiff on numerous occasions at work.
10. In one such telephone call, the Defendant's agent had misrepresented herself as a "special prosecutor" implying that the Defendant had some criminal powers to compel payment from the Plaintiff.
11. At no time did the Defendant send the Plaintiff a validation notice.
12. All of the defendant's telephone calls were made in connection with the collection of a consumer debt related to a credit card with Chase Bank which defendant has noted in its records as account 10-747591.
13. The Plaintiff has suffered damages as a result of these violations of the FDCPA.

**COUNT I - VIOLATION OF THE FAIR DEBT COLLECTION
PRACTICES ACT**

14. Plaintiff reincorporates the preceding allegations by reference.
15. At all relevant times Defendant - in the ordinary course of its business - regularly engaged in the practice of collecting debts on behalf of other individuals or entities.
16. Plaintiff is a "consumer" for purposes of the FDCPA and the Chase Bank account is a consumer debt.
17. Defendant is a "debt collector" under the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. §1692a(6).
18. Defendant's foregoing acts in attempting to collect this alleged debt violated the following provisions of the Fair Debt Collection Practices Act:
 - a. 15 U.S.C. §1692d;
 - b. 15 U.S.C. §1692e;
 - c. 15 U.S.C. §1692f;
 - d. 15 U.S.C. §1692g;
19. The Plaintiff has suffered damages as a result of these violations of the FDCPA.

DEMAND FOR JUDGMENT FOR RELIEF

Accordingly, Plaintiff requests that the Court grant her the following relief against the defendant:

- a. Actual damages.
- b. Statutory damages.

c. Statutory costs and attorney fees.

DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury in this action.

Respectfully submitted.

November 4, 2010

/s/ Gary Nitzkin
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